

Neighborhood Jobs Trust (NJT) PROGRAM GUIDE FY 2016

The Mayor's Office of Workforce Development A Division of BRA/EDIC

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PREFACE

The Neighborhood Jobs Trust (NJT) Program Guide serves as a handbook for contracted service providers to implement the NJT Job Training Services. This guide includes a description of NJT, grant requirements, best practices for programs, as well as information on data collection.

Additionally, all sample forms and informational documents are located in the Attachments section. Please use this manual as a resource for questions concerning NJT alongside your executed contract.

If the guide fails to answer your questions, please do not hesitate to contact Vroselyn Benjamin, Program & Special Initiatives Coordinator at OWD, at vroselyn.benjamin@boston.gov or at (617) 918-5245.

All forms included in this guide are also listed on the Mayor's Office of Workforce Development website, owd.boston.gov, under Partner Forms/Neighborhood Jobs Trust.

I. WHAT IS N.IT?

The Neighborhood Jobs Trust (the "Trust") is a Massachusetts public charitable trust created under the authority of Chapter 371 of the Acts of 1987 and the laws of the Commonwealth of Massachusetts, and is administered by the Collector-Treasurer of the City of Boston, Massachusetts (the "City") as managing trustee pursuant to Chapter 11 of the ordinance. The purpose of the Trust is to ensure that large-scale real estate development in Boston brings a direct benefit to Boston neighborhood residents in the form of jobs, job training and related services.

The Trust is managed by three Trustees: a member of the City Council appointed by the Mayor; the Director of the Office of Workforce Development; and the Collector-Treasurer of the City of Boston, who serves as a managing trustee. Administrative management of Trust funds is provided by the City of Boston's Office of Workforce Development (OWD).

Funds in the Trust come from jobs linkage fees. The Zoning law of the City of Boston requires that commercial construction projects in excess of 100,000 square feet receive a zoning variance, one condition of which is that the developer of the building is obligated to pay a linkage fee, based on square footage, to the Neighborhood Jobs Trust. Developers have two options for this:

- Job Contribution Grant the developer may simply make the payment to the Trust, to be administered in its entirety by the Trustees in accordance with established regulations and policies.
- O Jobs Creation Contribution upon making payment to the Trust, the developer may request that linkage funds be used to create a job training program for workers who will be employed, on a permanent basis, at the development project.

II. PURPOSE OF FUNDS

Jobs linkage funding must be used to meet the employment needs of lower income Boston residents, defined as below 80% of median income according to the U.S. Department of Housing and Urban Development. NJT is interested in serving lower-skilled individuals, with multiple barriers to employment.

The Neighborhood Jobs Trust is obligated to maintain a balance between services targeted to specific neighborhoods impacted by development and services accessible to residents across the city, including neighborhoods not currently impacted by large-scale development.

The intent of NJT funds are to serve Boston residents seeking full-time (at least 30 hours per week), permanent employment. The outcome of the program must be a training-related job, or placement into a post-secondary program leading to a position that is full-time and meets or exceeds the living wage of \$14.11/hour with access to benefits. Educational placements must have evidence of value or recognition in the particular economic sector leading to better opportunities for advancement. For certain populations, part-time jobs (at least 20 hours per week) may be a strategic first step and this waiver will be provided on a case-by-case basis upon OWD's approval.

Services should include outreach and recruitment, in-depth assessment, classroom and (as appropriate) work-site instruction, case management, educational and career counseling, job placement, and post-placement services. Job training programs should place participants on a career pathway that can lead to higher-paying jobs and have access to employer-provided education benefits and support in further training leading to better jobs. Because a significant part of developing economic security for families is financial management, program designs are strongly encourage to include financial education and asset building opportunities for participants. It is also essential that services are customized to the attributes and support needs of the program's target populations, and assist that population in overcoming their barriers to employment.

III. SERVICE PROVIDER PROCUREMENT

Fiscal Year 2016 is an open and competitive year, meaning that OWD issued a <u>Request for Proposal</u> (RFP) to qualifying service agencies. Contracts will be for a 12-month period. In issuing a contract, OWD makes no commitment to refunding, but reserves the right to refund programs based on the availability of funds and on program performance, organizational capacity, administrative responsiveness, and service to target populations.

CONTRACTING

OWD will notify programs if they have been awarded NJT funding. After being awarded, programs must work with OWD to develop their contract. In the contracting process, programs and OWD will come to an agreement on the number of participants to be enrolled and placed into training-related employment or post-secondary programs for the fiscal year and other program related matters.

The NJT contracts are hybrid performance-based contracts, with 50% of the total grant award to be paid upon contract execution, and 50% to be paid upon OWD's verification of placements achieved. There are also several other uniform contract forms that programs must complete.

All service provider's program and fiscal staff are required to review their contract in detail regarding the regulations of the program.

IV. REQUIREMENTS OF AWARDED PROGRAMS

All NJT funded programs must:

- Place at least 70% of the enrolled participants in full time (30 hours per week), training related employment with 30-day retention. Part-time training related employment (at least 20 hours per week) with 30-day retention, will be considered as a placement on a case by case basis. OWD will have the discretion to grant a waiver upon receipt of good cause documentation.
- Two or more part-time jobs adding up to 30 hours a week will not be considered a full-time placement and two or more part-time jobs adding up to 20 hours each will not be considered a part-time placement.
- OWD expects, but does not require, that wages meet the Living Wage standard (\$14.11/hour in Fiscal Year 2016).
- If OWD have approved that service provider can place participants into educational programs. The participant must be enrolled in a post-secondary or credential-awarded program either full-time or part-time with a full description and service plan of how this program will advance the participant into this economic sector for at least 30 days.

- All part-time placements must also be placed into a part-time (at least 20 hours per week) training-related employment or into another part-time post-secondary or credential-awarded program. EDIC will have the discretion to grant a waiver upon receipt of good cause documentation.
- 25% of NJT-Funded participants enrolled into a job training program must meet one or more of these criteria:
 - o Ex-Offenders and other individuals with CORI Issues
 - o Homeless or near-homeless individuals
 - Housing voucher recipients; or
 - o TANF recipients

V. PROGRAMMING

■ ENROLLMENT

- All enrollments must occur within the Service Provider's contract period.
- An individual must have attended a minimum of 75% of the scheduled class days within the contract period and fit the eligibility guidelines as stated in Attachment I.
- The participant must be listed on the NJT Enrollment Roster.
 - o Service Provider must complete and submit an Enrollment Roster within 2 weeks after the cycle start date.
 - Service Provider must complete the last column of the Enrollment Roster verifying which participants have completed/graduated the program and submit it to OWD within 2 weeks after the cycle end date.
- The participant's documentation must be collected, verified and maintained in the Service Provider's file and EDIC must approve the participant listed on the enrollment roster to be considered "an enrollment".
- Contractors are required to maintain accurate, up-to-date attendance records for each NJT skills training participant.
 - 25% of participants enrolled into the job training program under NJT must meet one or more of these criteria: Ex-Offender and other individuals with CORI issues, Homeless or near-homeless individuals, Housing voucher recipients, or TANF recipients. Please see definition for Targeted Enrollment definitions.
 - With OWD's approval the contractor can over-enroll by 20% of the enrollment number approved during contract negotiation. All participants who are over-enrolled into the program must fit all the NJT participant eligibility criteria to be counted as an enrollment and be enrolled into the program within the contract period.

SITE VISITS

<u>Site visits</u> to NJT funded service providers are conducted at least once per year. The purpose of a site visit is for OWD to get better acquainted with vendor's programming and to conduct a file review.

The <u>File Review</u> consists of reviewing the participants' eligibility documentation. OWD may review a sample or all NJT participant Files, in hard copy and in the enrollment rosters submitted to OWD. See Attachment I for what should be included in a NJT Participant file. All participant files must be archived/stored for at least 7 years in case of future audits.

A <u>Classroom Observation</u> may be requested. The Classroom Observation could consist of speaking with participants in the program regarding their opinion of the quality of the services delivered. Participants may be asked to share and provide feedback about their experience in the program. Other site visits could include help with technical assistance as requested, and/or presence at program events such as graduations or special performances.

REPORTS

Service providers submit a **quarterly report** which provides cumulative data regarding the participants enrolled in the program. OWD uses Google Form for NJT's quarterly reports. The Google database is used for service providers to enter data, update client progress, and report outcomes. All questions that will be asked on the quarterly report will be provided to all organizations ahead of time. If your organization is unfamiliar with Google Form, OWD will provide training.

A vendor's final quarterly report is due after OWD have received their final invoice (e.g. if your organization submits their final invoice on 7/10/2017 the final quarterly report will be due on 7/15/2017).

OUARTERLY PHONE CONFERENCES

OWD conducts mandatory quarterly phone conference with each service provider to review their recent quarterly report, provide technical assistance, and for regular check-ins. OWD will send an email invitation to your program staff that will reoccur every quarter.

- Program staff and OWD staff can reschedule the phone conference up to 30 minutes before the scheduled phone call
- OWD staff will remain on the line for up to 10 minutes. If program staff does not get on the line within 10 minutes
 OWD staff will reschedule the call.
- OWD staff will maintain detail notes regarding service provider's performance and program administration which will be updated after each quarterly phone conference. OWD staff will provide service provider with necessary action steps after each call if needed.

■ INVOICING

Service Provider must bill on a quarterly basis by completing and submitting the NJT Outcome invoice, the Employee Verification form or a generated form by the Employer or the Educational Program Administrator with all the information OWD requests. The verification form must be completed and signed by the Employer or Educational program administrator and the NJT Authorization Obtain and Release form must be signed by the participant listed in the invoice. Allowable Employee Verification Documents:

- Completed and signed NJT Employee Verification form by the participant's employer.
- Employee Verification document by the Employer which includes all the information requested on the NJT Employee Verification form.
- Copy of New Hire Letter and copies of 4 consecutive paystubs if paid weekly or 2 consecutive paystubs if paid biweekly. (With these two documents OWD should be able to determine start date, 30 day retention, participant's job title, hourly wage, number of hours work per week, and the nature of their benefits. If this information is not provided with both documentation NJT Service Provider must obtain another form of verification from the participant's employer)
- Letter from participant's advisor or the educational program administrator verifying part-time or full-time enrollment in post-secondary education program and the certificate or degree their expected to obtain at the time of completion.

Information to note:

- This is a performance-based contract, with 50% of the payments contingent upon job placements. For compensation, OWD requires that all placements occur within the contract period or within the 90 day period following the end of the contract.
- All vendors have a total of 100 days after their contract expire to submit their final invoice to OWD. If your organization does not reach the placement goal or misses the deadline to submit their final invoice. Any remaining funds committed to your organization would go back into the Trust and will no longer be available for invoicing.
- The initial 50% of the contract amount will be advanced to the Service Provider upon contract execution and the receipt of signed and completed Cash Advance Letter from the Service Provider.

■ CORRECTIVE ACTION

<u>Corrective Action</u> is the process that occurs prior to contract suspension and/or termination and the de-obligation of funds, and after all other technical assistance efforts have proven to be ineffective in reaching a resolution.

EDIC Program Management will initiate corrective action in the following situations:

- When a regulatory violation has occurred;
- When participants' health or safety is threatened;
- When primary contracted services have not been delivered;
- When funds have been improperly expended; or
- In the event that performance is significantly below plan.

Attachment I

NJT Participants Eligibility

All Service Providers must enroll individuals in need of skilled employment who are unemployed or underemployed. This can include people who have been out of the labor force for some time as well as individuals who are underemployed. Underemployed can mean: those in temporary, part-time or unstable positions; those working in jobs without benefits, those whose income does not suffice to meet the needs of their families.

Participants funded by this grant must meet these eligibility criteria:

- Boston resident
- 18 Years old or older
- Must be willing and be able to be placed in and retain full-time, unsubsidized employment or be placed in postsecondary education leading to a career leading to full-time employment in a living wage job.
- Must meet income guideline of being at or under the income benchmarks.
- Targeted Enrollment Benchmark —At least 25% of the individuals enrolled in the training program funded by NJT must come from one of these target populations:
 - Ex-offenders and other individuals with CORI issues
 - Homeless or near-homeless individuals
 - Housing voucher recipients; or
 - o TANF recipients.

Particip	ant's files must contain the following:
	A copy of the participant's intake form
	Proof of Boston residency
	Proof of Age
	Household Income (this includes proof of income, Family Size Worksheet and Income Calculation Sheet (s))
	Documentation and Verification of Authorization to Work
	Signed and completed Authorization for Release of Information Form (provided separately from this packet)
	Resume
Other d	ocuments that service providers may include in participant's files:
	Individual Service Plan
	Case Notes
	Job Search Records
	Pre and Post Tests or Assessment Tools
	Attendance Record

Proof of Boston Residency

Verification

Before any participant is enrolled in a NJT funding skill training program, they must provide the following required proof of primary residency to the training center as part of their enrollment. Participants will not be approved without the required documents.

A photo ID plus one the following documents: (If the photo ID does indicate participant's current address a secondary document is not necessary)
☐ A Utility Bill (not water or cell phone) dated within the past 60 days of enrollment.
☐ A Deed, Mortgage Payment dated within the past 60 days of enrollment, or Property Tax Bill dated within the last year
☐ A current Lease, Section 8 Agreement, or a notarized letter verifying residency from the owner or lesse of the property where the participant lives this letter must be signed by the property owner.
☐ A W2 form dated within the year or a Payroll Stub dated within the past 60 days of enrollment.
☐ A Bank or Credit Card Statement dated within the past 60 days of enrollment.
☐ A Letter from homeless shelter
☐ A Letter from an Approved Government Agency* dated within the past 60 days of enrollment.
☐ Other:
*Approved government agencies: Departments of Revenue (DOR), Children and Family Services (DCF), Transitional Assistance (DTA), Youth Services (DYS), Social Security, any communications on Commonwealth of Massachusetts Letterhead.

*This list is not exhaustive; if there is another official document that the participant can provide to prove Boston Residency please obtain the approval of Vroselyn Benjamin, Program Coordinator of NJT. If she approves, you can utilize the document as "other".

Proof of Age

Verification

Before any participant is enrolled in a NJT funding skill training program, they must provide the following required proof of Age to the training center as part of their enrollment. Participants will not be approved without the required documents.

Proof of age includes providing the full name and date of birth. Listed below are acceptable documents you can use, provided they include your full name:
□ Driver License : Driver License, Learner Permit or State-Issued Identification Card from MA or another state, Puerto Rico, a U.S. territory, or a Canadian province that is expired less than two years. The DL/ID or learner permit submitted must reflect a photo.
☐ Birth Certificate : Certified birth certificate issued by a government agency in the US, Puerto Rico, a U.S. territory or Canada, or U.S. Report of Consular Birth Abroad.
☐ Motor Vehicle Driver's Record : Certified MA Motor Vehicle Record, Non-Certified NC Motor, Vehicle Record.
☐ US Military ID : US Military ID Valid unexpired U.S. military ID, including DD-2, DD-214, or U.S. Military Dependents Card, U.S. Veteran Universal Access Card.
☐ Passport : Valid, unexpired passport from any nation.
☐ Certified Marriage Certificate : Certified marriage certificate from a Register of Deeds or government agency in the U.S, Puerto Rico, U.S. territories or Canada.
☐ Court Documents: Court documents from US jurisdiction, Puerto Rico, US territories or Canada.
o Divorce decree
 Court order for change of name or gender
 Adoption papers
 Certified Court order for child support
□ Other:

*This list is not exhaustive; if there is another official document that the participant can provide to prove Boston Residency please obtain the approval of Vroselyn Benjamin, Program Coordinator of NJT. If she approves, you can utilize the document as "other."

HUD 2015 INCOME LIMITS FOR NJT

Boston Primary Metropolitan Statistical Area

FAMILY SIZE	2015 INCOME LIMITS
1	\$48,800.00
2	\$55,800.00
3	\$62,750.00
4	\$69.700.00
5	\$75,300.00
6	\$80,900.00
7	\$86,450.00
8	\$92,050.00

NJT Income Eligibility Documentation Guidelines

To determine if a person meets the NJT income guidelines, you will need to establish the income source(s) and the family size. The following guidelines are intended to help you determine what documents to request and how to conduct your calculations.

Household must provide written documentation of all income for all family members at least 18 years of age. Acceptable documentation includes four consecutive pay statements if paid weekly or two consecutive pay statements if paid bi-weekly or a letter from an employer for wage earners, and an award letter from the administering agency if the applicant is receiving public assistance, i.e., TAFDC, UI, SSI/SSDI, etc..

Documentation cannot be older than 60 days and all documentation must be included in the applicant's file with attached income calculation sheet for each household member who has a source income.

- 1. If the person has had **no income in the past 60 days**, you will need to have them sign the applicant statement form verifying this information. It will be in your interest to establish how they will support themselves (and their family) for the duration of the program. It is recommended that you add this information to the written statement.
- 2. For the purpose of determining **family size** for the NJT contract, family is defined as "two or more persons related by blood, marriage, or decree of court, who are living together in a single residence. A family may also be composed of two or more people living together (this excludes roommates but includes partners) and/or one of whom is a dependent child under the age of 18 (up until 18th birthday) and are included in one or more of the following categories:
 - A. Applicant, spouse and dependent children
 - B. Parent or guardian (that is, the applicant) and dependent children
 - C. Applicant and spouse
 - D. Applicant and applicant's partner
 - E. Applicant, applicant's partner, and dependent children
- 3. Acceptable documentation of family size can be an Internal Revenue Service 1040 tax form from the previous year or a signed applicant statement.
- 4. If there is a spouse or partner is the household, the spouse's or partners' income must be declared and documented, before you can determine if the applicant meets the income guidelines.
- 5. If the applicant is a young adult who is living in the parents' home but is not a dependent, you should gather information about the family's financial situation, then consult with OWD to help determine eligibility. The decision will be made on a case by case basis in light of the goal to use NJT funding to serve people who do not have alternative means to pay for training.

FAMILY SIZE WORKSHEET

I,		hereby state under the penalty of
perjury that my family size is:	(Which includes mys	elf.)
The following are the names, relations the household income:	of family members and income the	nat each family member contributes to
Full Name	Relationship to Applicant	Annual Income (attach income calculation worksheet)
1.		
2.		
3.		
4.		
5.		
6.		
7.		
8.		
For the purpose of determining family size for marriage, or decree of court, who are living to living together (this excludes roommates but i 18th birthday) and are included in one or mor Applicant, spouse and dependent chi. Parent or guardian (that is, the applicant and spouse Applicant and applicant's partner Applicant, applicant's partner, and a	ogether in a single residence. A family moncludes partners) and/or one of whom is the following categories: ldren is ldren in and dependent children	
I attest the information stated above is true and may be grounds for my immediate termination		information, if misrepresented or incomplete, lties as specified by law.
Applicant's Signature:	Date	:
Staff Person:	Date	:
AGENCY:		

NJT Income Calculation Sheet

Please include income documentation within the last 60 days prior to enrollment.

Household Name:				
Head of Household (H	IOH)? (Circle	Yes No (if "N	No" please complete th	e relationship to HOH)
Relationship to HOH: If paid weekly: Wages: Week 1				
+ Week 2				
Week 3				<u>Totals</u>
	=_	/4=	x 52 =	1
f paid bi-weekly Week1-2				
+ Week 3-4	=_	/2=	x 26=	2
	frequency) 12 : 52 =			4
SI/SSDI	26			
x1	2 =			5
Jnemployment				
x5	52=			6
Other:(Circle f	requency)			
x :	12 52 =			7
2	26		Total vearly i	ncome

APPLICANT STATEMENT

The Applicant Statement may be used to document eligibility for family income when all other attempts to secure documentation have been exhausted. This form may also be used to describe the applicant's housing situation.

I attest that the information provided is true and accurate, and understand that the information, if misrepresented, or incomplete, may be grounds for immediate termination and/or penalties as specified by law. I further acknowledge that the accuracy of the information for eligibility is subject to external verification and may be released for such purposes.

Example of qualifying Statement:

I certify under the penalty of perjury that I have not received any income from any source during the past 60 days that I had not been employed during that time, and have been supported by donations/contributions from relatives and friends.

I,		_, hereby attest an	d certify, under penalty	of perjury that I	
	APPLICANT'S SIGNATURE		I	DATE	
	APPLICANT'S ADDRESS	CITY	STATE	ZIP	
	Progra	am Operator Use Onl	======================================		
	The above Applicant Statement is being utilized for documentation of the following eligibility criteria:				
	☐ Individual/Family Income	e	☐ Housing situation		

NEIGHBORHOOD JOBS TRUST AUTHORIZATION TO WORK

	_			
Participant's name				
Organization conducting document verification:				
Telephone number:				
Name of person verifying eligibility document:				
Date of document verification:				
Document verification must prove work authorization in the U.S.				
Check document(s) viewed:				
☐ Social Security Card				
☐ Certificate of Naturalization				
☐ United States Birth Certificate				
☐ United States Passport				
Separation/Discharge/Retirement Military Services Documentation (including DD Form 214, R Separation, or equivalent)	Report of			
Verification				
I attest that, under penalty of perjury, the information recorded by me on this document was obtained on the above date through viewing the indicated eligibility document(s).				
Signature of eligibility document reviewer:				
Date:				

Attachment II

NJT Targeted Enrollment Benchmark

All programs funded under NJT will be expected to enroll at least 25% TANF recipients, Housing Voucher recipients, homeless or near-homeless individuals, or people with CORI issues. Please see definitions below:

TANF/TAFDC Recipients:

Transitional Aid to Families with Dependent Children (TAFDC) also known as TANF (Temporary Assistance for Needy Families) is a government program that gives cash and health insurance to needy families with dependent children. TAFDC helps families meet the basic needs of their children. TAFDC is sometimes called "welfare" or "public assistance."

Housing Voucher Recipients:

A participant who is currently a recipient of one of the following housing vouchers:

- Mobile or Project-Base Section 8 voucher which is funded by the federal government through the U.S.
 Department of Housing and Urban Development (HUD)
- Massachusetts Rental Voucher Program (tenant-based vouchers) which is a state-funded voucher program. There are two components to this program: tenant-based (or mobile) vouchers, and projectbased (non-mobile) vouchers.
- Alternative Housing Voucher Program which is a state-funded program provided to people with disabilities who under 60 years are of age and their families who are on waiting lists for state public elderly/disabled housing at housing authorities that have rented 13.5% of their apartments to non-elderly disabled tenants.
- The Department Mental Health (DMH) rental assistance program which is a state-funded rental subsidy program.

Please note tax-credit units or moderate-income units will not be considered under this definition housing voucher.

CORI:

A CORI (Criminal Offender Record Information) is a person's criminal history. An individual will have a Massachusetts CORI if you have ever been charged with a crime in a state or federal court in Massachusetts, whether your case ended with a conviction, a finding of not guilty, charges were dismissed, or another outcome.

An individual's CORI is a record of all criminal cases where they appeared before a judge in a court in Massachusetts. Their CORI includes pending charges, prior convictions, and cases that ended without a conviction (for example, a finding of not guilty, or cases that were dismissed.

Homelessness

- 1. In places not meant for human habitation, such as cars, parks, sidewalks, abandoned buildings (on the street).
- 2. In an emergency shelter.
- 3. In transitional or supportive housing for homeless persons who originally came from the streets or emergency shelters.
- 4. In any of the above places but is spending a short time (up to 30 consecutive days) in a hospital or other institution.
- 5. Is being evicted within a week from a private dwelling unit and no subsequent residence has been identified and lacks resources and support networks needed to obtain housing.
- 6. Is being discharged within a week from an institution, such as a mental health or substance abuse treatment facility or a jail/prison, in which the person has been a resident for more than 30 consecutive days and no subsequent residence has been identified and the person lacks the resources and support networks needed to obtain housing.
 - ➤ For example, a person being discharged from prison after more than 30 days is eligible ONLY IF no subsequent residence has been identified and the person does not have money, family or friends to provide housing.
- 7. Is fleeing a domestic violence housing situation and no subsequent residence has been identified and lacks the resources and support networks needed to obtain housing.

Near Homelessness or At-Risk of Homelessness

- 1. Has moved because of economic reasons 2 or more times during the 60 days immediately preceding enrolling to the program.
- 2. Is living in the home of another because of economic hardship.
- 3. Has been notified within 60 days of enrollment that their right to occupy their current housing or living situation will be terminated within 30 days.
- 4. Lives in a hotel or motel and the cost is not paid for by charitable organizations or by Federal, State, or local government programs for low-income individuals.
- 5. Lives in an SRO or studio apartment in which there reside more than 2 persons or lives in a larger housing unit in which there reside more than one and a half persons per room (overcrowded housing).
- 6. Is exiting a publicly funded institution or system of care otherwise lives in housing that has characteristics associated with instability and an increased risk of homelessness.

How to document the above information in participant's NJT files:

Please collect documentation that verifies this information. This can also be a self-certified statement if no other documentation can be obtained. OWD is relying on the vendors to flag the participants who fit the 25% benchmark and then verify this somehow in their file. For example, if a participant receives TANF, a copy of their award letter, If the participant is a Housing Voucher recipient a copy of their, recertification letter, or voucher certificate. For CORI and homelessness, though, the "proof" is a bit more difficult to document, a self-certified statement may be the most feasible option to collect. Feel free to contact Vroselyn Benjamin to discuss options for documentation.